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November 27, 2023

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State, No. 23 Civ. 1471 (JMF)*

Your Honor:

I am an attorney at Beldock Levine & Hoffman LLP, one of the attorneys representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”). On behalf of Plaintiffs, I write to respectfully request a two-week extension of the December 8, 2023 deadline for Plaintiffs to respond to Defendant’s motion for summary judgment. Under the revised briefing schedule, Plaintiffs’ opposition brief would be due December 22, 2023 and Defendant’s reply, if any, would be due on January 22, 2024.

This is the first request by Plaintiffs for an extension of the briefing schedule, which is necessary due to the trial commitments in another matter of our lead counsel, David Rankin, and my own unanticipated need to extend my parental leave. Defendant consents to this request.

We thank the Court for its attention to this matter.

BELDOCK LEVINE & HOFFMAN LLP

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Respectfully submitted,



Jeffrey F. Kinkle

cc: Defendant's counsel (by ECF)

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 24.

SO ORDERED.



November 28, 2023